

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Amendment of Part 97 of the Commission's	)	
Amateur Radio Service Rules to Eliminate	)	RM - 10786
Morse Code Proficiency Testing Requirements	)	
For All Classes of Amateur Licenses	)	
	)	
To: The Commission	)	

Comments Of [Thomas Berger](#)

Dear Reader,

If you go to a CompUSA you will notice that today's technology has changed very much over the years. Silicon is so small and powerful that we can build a whole cell-phone using three DSP (digital signal processors) chips. This is a significant change, it means today's radio technology does still use modulated carriers. However this carrier wave is not modulated using analog technology, but is synthesized using fully digital techniques (VLSI – very large scale integrated circuits).

Why this is relevant to for FCC licenses: While in the past a radio had an oscillator which was modulated using a voice signal; today's radios lack such circuitry. One of the justifications of learning morse code has always been it's use in emergency situations – because the oscillator circuit in discrete radio's was usually more reliable than other parts. This argument is moot, because while today's radios have oscillators, they are part of the whole DSP circuit: using a PLL (phase locked loop) implemented using VLSI circuits which also provide other functionality like carrier modulation. As such, either the whole radio works – or it is broken.

In the light of these advances in technology and the design of today's radios I am convinced that a morse code test is a waste of time as it serves no legitimate regulatory purpose.

Furthermore, it appears that the maintenance of the Morse requirement appears to be contrary to one of the commission's statutory mandates as even the IARU recognizes that continuing Morse proficiency requirements is not in the best interest of the future of the amateur radio service. I would like to remind that it is not in the public interest for the Commission to impose more onerous and unnecessary burdens on those seeking a Commission-issued amateur radio license than would be faced by equally qualified individuals in other countries, as this will unnecessarily limit the pool of operators available for emergency communications.

Respectfully submitted,

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